

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO.: 3:24-cv-00712-HTW-ASH**

**MISSISSIPPI STATE SENATE**

**DEFENDANT**

---

**AMENDED MOTION TO STAY THE ENTIRETY OF THE PROCEEDINGS,  
INCLUDING THE DEADLINE FOR RESPONSIVE PLEADING  
(UNOPPOSED)**

---

Defendant, Mississippi State Senate (“Senate”), files this Amended Motion to Stay the Entirety of the Proceedings, which is unopposed, to allow the Trump administration the opportunity to fully review this matter. Specifically, the Defendant moves for an entry of an Order:

1. Staying all proceedings for ninety days from the entry of the Order;
2. Explaining the purpose of the Stay is to allow the Plaintiff, in accordance with the Department of Justice’s January 22, 2025, internal memorandum, to review this matter, including whether the alleged discriminatee is exempt from Title VII of the Civil Rights Act of 1964. (Ex. A, Doc. 14).
3. Providing the Senate shall have the right to seek an extension of the Stay if Plaintiff, at least seven days prior to the Stay’s expiration, has not provided written confirmation to the Senate that the purpose of the Stay, noted above, has

been completed, and in that event, the Plaintiff shall not unreasonably withhold its consent to any necessary extension of the Stay.

4. Counsel for the United States of America does not oppose this Motion.
5. This Motion is not filed for purposes of delay, but rather to conserve the Court's and the parties' resources. Due to the relatively simple nature of the relief requested and the fact the motion is unopposed, the Senate requests the Court not require it submit a memorandum brief.

Respectfully submitted February 25, 2025.

MISSISSIPPI STATE SENATE

BY: s/ Armin J. Moeller, Jr.  
Attorney for Mississippi State Senate

Armin J. Moeller, Jr. (MSB 3399)  
Russell Dumas (MSB 105310)  
BALCH & BINGHAM LLP  
188 East Capitol Street, Suite 1400  
Jackson, MS 39201  
Telephone: (601) 961-9900  
Facsimile: (601) 961-4466  
amoeller@balch.com  
rdumas@balch.com

Lindsey Thomas Dowdle (MSB 102873)  
Mississippi Attorney General's Office  
550 High Street, Suite 1100  
Jackson, MS 39205  
Telephone: (601) 359-3020  
Facsimile: (601) 359-2003  
Lindsay.dowdle@ago.ms.gov

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and service will be perfected upon the following CM/ECF participant(s) electronically on February 25, 2025.

*s/ Armin J. Moeller, Jr.*

Of Counsel